

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Digital Audio Broadcasting Systems And Their)	
Impact On the Terrestrial Radio Broadcast Service)	MM Docket No. 99-325
)	DA 01-2932
Reply Comments on National Radio Systems)	
Committee DAB Subcommittee's "Evaluation)	
of the iBiquity Digital Corporation IBOC System")	

**Reply Comments of the International Association of Audio Information Services (IAAIS)
on National Radio Systems Committee DAB Subcommittee's "Evaluation of the iBiquity
Digital Corporation IBOC System"**

While many who have invested in IBOC are ready for an immediate roll out, we ask the Commission to continue it's cautious course of gathering all the data possible prior to authorizing a new system. There are enough variables yet to be discussed including the ability to provide auxiliary services in the extended hybrid mode and the newer PAC algorithm to give reason to proceed with great care.

We applaud NPR for reminding us that the additional capacity be used for programming and not all text/data. The public will most readily accept more audio programming and need less technology to use it. A financially sound roll out of the new system should include, allow, and encourage these services to develop first.

The FCC must declare "a standard" to ensure manufacturers can create the most useful IBOC receiver... including RRS'. Over and over thru the comments we read that the FCC must declare "standards" to give manufacturers confidence in tolling for production. We encourage the Commission to include a method for blind and visually impaired consumers to use off-the-shelf digital FM radios to hear the reading services in the new, digital system.

Consideration needs to be made to assist in the costs of transition. Reading services, like public radio, do not have the ability to raise advertising rates, or sell air-time to recoup the costs of transition. Considerations must be made to assist in moving these charitable and publicly supported services from analog to digital. Furthermore, listeners to analog services who have impaired ability to use the regularly received signals after the digital signal is implemented in their area, should be provided restoration to that analog signal by the source of the interference.

The Commission may rely on IAAIS to assist by provide such information and expertise as it has available in its membership to help establish a fully functioning, and disability friendly digital FM system. IAAIS members again publicly thank the Commission for the opportunity to

participate in the process and acknowledge the ongoing support of iBiquity Digital Corporation in the testing and further development of an FM IBOC system.

Respectfully submitted by:

/s/

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